

# ADMORE LIGHTING INC. MOBILE APP PRIVACY POLICY

Last updated July 20, 2020

ADMORE LIGHTING INC. (“we” or “us” or “our”) respects the privacy of its users (“user” or “you”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you download and use our mobile application (the “Application”). Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE APPLICATION.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last updated” date of this Privacy Policy. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Application after the date such revised Privacy Policy is posted.

This Privacy Policy does not apply to the third-party online/mobile store from which you install the Application or make payments, including any in-game virtual items, which may also collect and use data about you. We are not responsible for any of the data collected by any such third party.

## COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways. The information we may collect via the Application depends on the content and materials you use, and includes:

### **Personal Data**

Demographic and other personally identifiable information (such as your name and email address) that you voluntarily give to us registering for the service. If you choose to complete your profile, we will securely retain this information. Any information that you enter will not be shared or sold to any other party.

### **Geo-Location Information**

We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using the Application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

### **Mobile Device Access**

We may request access or permission to certain features from your mobile device, including your mobile device's Bluetooth service. If you wish to change our access or permissions, you may do so in your device's settings.

### **Mobile Device Data**

Device information such as your mobile device ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide.

### **Push Notifications**

We may request to send you push notifications regarding your account or the Application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

### **Data from Contests, Giveaways, and Surveys**

Personal and other information you may provide when entering contests or giveaways and/or responding to surveys.

## **USE OF YOUR INFORMATION**

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Application to:

1. Administer sweepstakes, promotions, and contests.
2. Assist law enforcement and respond to subpoena.
3. Compile anonymous statistical data and analysis for use internally.
4. Create and manage your account.
5. Deliver targeted advertising, coupons, newsletters, and other information regarding promotions and the Application to you.
6. Email you regarding your account or order.
7. Fulfill and manage purchases, orders, payments, and other transactions related to the Application.

8. Generate a personal profile about you to make future visits to the Application more personalized.
9. Increase the efficiency and operation of the Application.
10. Monitor and analyze usage and trends to improve your experience with the Application.
11. Notify you of updates to the Application.
12. Offer new products, services, mobile applications, and/or recommendations to you.
13. Perform other business activities as needed.
14. Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.
15. Process payments and refunds if and when pay-for-services are made available.
16. Request feedback and contact you about your use of the Application.
17. Resolve disputes and troubleshoot problems.
18. Respond to product and customer service requests.
19. Send you a newsletter.
20. Solicit support for the Application.

## **DISCLOSURE OF YOUR INFORMATION**

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

### **By Law or to Protect Rights**

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

### **Third-Party Service Providers**

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

### **Sale or Bankruptcy**

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

## **SECURITY OF YOUR INFORMATION**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

## **POLICY FOR CHILDREN**

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data we have collected from children under age 13, please contact us at [www.admorelighting.com](http://www.admorelighting.com).

## **OPTIONS REGARDING YOUR INFORMATION**

### **Account Information**

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account
- Contacting us using the contact information provided below

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

### **Emails and Communications**

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Application
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

## **CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Application, you have the right to request removal of unwanted data that you publicly post on the Application. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Application, but please be aware that the data may not be completely or comprehensively removed from our systems.

## **General Data Protection Regulation (GDPR)**

Article 13 of Regulation EU 2016/679

### **1. Purpose of this notice**

This Privacy Notice provides mandatory information as required under Articles 13 and 14 of the European General Data Protection Regulation (GDPR) regarding the transparency of personal data processing. Definitions of certain terms within this notice are explained in the appendix.

### **2. Your Rights**

As a Data Subject you have rights under the GDPR. These rights can be seen below. ADMORE LIGHTING INC. will always fully respect your rights regarding the processing of your personal data. You can reach us by using the contact information below if you have any concerns or questions regarding how we process your data, or if you wish to exercise any rights you have under the GDPR.

### **3. Data Protection Principles**

ADMORE LIGHTING INC. has adopted the following principles to govern its collection and processing of Personal Data:

- Personal Data shall be processed lawfully, fairly, and in a transparent manner.
- Personal Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and/or processed. Personal Data shall be accurate and, where necessary, kept up to date.
- The Data Subject has the right to request from ADMORE LIGHTING INC. access to and rectification or erasure of their personal data, to object to or request restriction of processing concerning the data, or to the right to data portability
- The Data Subject has the right to make a complaint directly to a supervisory authority within their own country.
- ADMORE LIGHTING INC. will not use personal data for any monitoring or profiling activity or process and will not adopt any automated decision-making processes.

#### **Personal Data:**

(Article 4 of the GDPR): 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be

identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing:**

(Article 4 of the GDPR): means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, erasure or destruction.

**Legal Basis for Processing:**

(Article 6 of the GDPR): At least one of these must apply whenever personal data is processed:

1. Consent: the individual has given clear consent for the processing of their personal data for a specific purpose.
2. Contract: the processing is necessary for compliance with a contract.
3. Legal obligation: the processing is necessary to comply with the law (not including contractual obligations).
4. Vital interests: the processing is necessary to protect someone's life.
5. Public task: the processing is necessary to perform a task in the public interest, and the task or function has a clear basis in law.
6. Legitimate interests: the processing is necessary for the legitimate interests of the Data Controller unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

**Data Controller:**

(Article 4 of the GDPR): this means the person or company that determines the purposes and the means of processing personal data.

**Data Processor:**

(Article 4 of the GDPR): means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller.

**Data Subject Rights:**

(Chapter 3 of the GDPR) each Data Subject has eight rights. These are:

1. The right to be informed; This means anyone processing your personal data must make clear what they are processing, why, and who else the data may be passed to.
2. The right of access; this is your right to see what data is held about you by a Data Controller.
3. The right to rectification; the right to have your data corrected or amended if what is held is incorrect in some way.

4. The right to erasure; under certain circumstances you can ask for your personal data to be deleted. This is also called 'the Right to be Forgotten'. This would apply if the personal data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been withdrawn, or the personal data has been unlawfully processed.
5. The right to restrict processing; this gives the Data Subject the right to ask for a temporary halt to processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.
6. The right to data portability; a Data Subject has the right to ask for any data supplied directly to the Data Controller by him or her, to be provided in a structured, commonly used, and machine-readable format.
7. The right to object; the Data Subject has the right to object to further processing of their data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.
8. Rights in relation to automated decision making and profiling; Data Subjects have the right not to be subject to a decision based solely on automated processing.

## **CONTACT US**

If you have questions or comments about this Privacy Policy, please contact us at:

AdMore Lighting Inc.

Calgary, AB, CANADA

Ph: (877) 564-8100 (toll free)

e-mail: [support@admorelighting.com](mailto:support@admorelighting.com)